

6. Defendant/Counter-Plaintiff may not have joined parties necessary for a just adjudication of the issues.

7. This Court may not have jurisdiction over the subject matter of the Counterclaim for a Declaratory Judgment.

ANSWER TO COUNTERCLAIM FOR A DECLARATORY JUDGMENT

1. Based on information and belief, Plaintiff/Counter-Defendant admits the allegations in Paragraph 1. Plaintiff/Counter-Defendant does not know the state(s) of residence of any of the members of the Defendant/Counter-Plaintiff Limited Liability Company.

2. Admitted.

3. Plaintiff/Counter-Defendant denies the allegations in Paragraph 3.

4. Plaintiff/Counter-Defendant denies the allegations in Paragraph 4.

5. Plaintiff/Counter-Defendant denies the allegations in Paragraph 5.

6. Plaintiff/Counter-Defendant denies the allegations in Paragraph 6.

Plaintiff/Counter-Defendant denies the allegations contained in the “WHEREFORE” clause, and specifically denies that Defendant/Counter-Plaintiff is entitled to a declaratory judgment or any other relief sought by Defendant/Counter-Plaintiff in the “WHEREFORE” clause and/or the Counterclaim for a Declaratory Judgment.

This 3rd day of November, 2022.

/s/ David A. Terry
David A. Terry
Mississippi Bar No. 106199
COZEN O’CONNOR
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Attorney for Plaintiff/Counter-Defendant
Palomar Specialty Insurance Company

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

PALOMAR SPECIALTY INSURANCE
COMPANY,

Plaintiff/Counter-Defendant

vs.

J.S. HELD LLC,

Defendant/Counter-Plaintiff

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Civil Action No. 2:22-cv-136-TBM-RPM

CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2022, I electronically filed the foregoing **PALOMAR SPECIALTY INSURANCE COMPANY'S ANSWER TO J.S. HELD LLC's COUNTERCLAIM FOR DECLARATORY RELIEF** with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorney of record:

Edward J. Currie, Jr.
CURRIE JOHNSON & MYERS, P.A.
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P.O. Box 750
Jackson, MS 39205-0750
ecurrie@curriejohnson.com

This 3rd day of November, 2022.

/s/ David A. Terry

David A. Terry

Mississippi Bar No. 106199